

# **IOWA COLLEGE STUDENT AID COMMISSION**

## **Brescia University Application for Postsecondary Registration October 14, 2016**

***STAFF ACTION: Approve the Iowa registration request for Brescia University for a two-year term that begins on October 14, 2016, and ends on October 14, 2018.***

### **Registration Purpose**

Revised Iowa Code Sections 261B.2 (definitions) and 261B.3 (effective July 1, 2012) require a school to register with the Commission if a person compensated by the school conducts any portion of a course of instruction, including by in-person, distance education, or correspondence method in this state or if the school otherwise has a presence in this state. Presence means a location in Iowa at which a student participates in any structured activity related to a school's distance education course of instruction. Presence also means an address, location, telephone number, or internet protocol address in Iowa from which a school conducts any aspect of its operations. Brescia University applied for registration to offer distance education programs. Staff required Brescia University to register because the school is requesting to offer distance education programs to Iowa residents which contain field work to be completed by the student in the state of Iowa.

### **Institutional Information**

Brescia University (the University) is a private non-profit institution whose main campus is located at 717 Frederica Street, Owensboro, Kentucky, 42301. The school's chief executive officer is President, Reverend Larry Hostetter, Doctor of Sacred Theology (S.T.D), located at 717 Frederica Street, Owensboro, Kentucky, 42301, Administrative Building 131. Due to the fact that the University is applying for registration to offer wholly online programs, it has no Iowa contact person. The University is not registered with the Iowa Secretary of State as a corporation conducting business in Iowa, and the Commission cannot require that it do so.

*Physical Facilities:* Not applicable for a distance education program provider.

*Accreditation:* The University is regionally accredited by the Southern Association of Colleges and Schools Commission on Colleges, which is recognized by the federal Department of Education.

*Federal Stafford Loan Cohort Default Rate (FFY 2013):* 10.3%. For comparison purposes, the FFY 2013 national average cohort default rate is 11.3%.

*Graduation Rate:* This is the percentage of first-time, full-time undergraduate students who graduated within 150% of the normal time for program completion, as reported to the federal Department of Education. The graduation rate for Brescia University is 30%.

*Average Loan Debt upon Graduation:* For students who graduated in 2013 and 2014, \$21,527.

*Record Preservation:* The University stores all records in their vault or on servers which are backed up daily.

*Transcript Requests:* The University has authorized the National Student Clearinghouse to provide online transcript ordering to the University's students. To order transcripts online students must log in to the Clearinghouse Secure Site, the site will then walk them through placing the order. Students have delivery options, either through mail or electronically. Transcripts prior to 1985 are not available via electronic delivery. In order for a student to order their transcript via mail, they must fill out a transcript request form located at <https://www.brescia.edu/uploads/NEW-Transcript-Request.pdf> and mail it to the office of the Registrar. Students with additional questions can contact the office of the Registrar.

*Instructional Methodology:* The University uses Moodle as the eLearning platform for online course delivery. Students are able to download the software onto their web server. If a student needs technical assistance, the student may obtain that help through the University or through Moodle Partners directly. Students may personalize their Moodle by enabling or disabling core features and by integrating a range of built in features as well as external collaborative tools, such as forums, wikis, chats and blogs. Moodle is also available through mobile access as well as through iPad. Students can access the site via web through their iPad or they can download the iPad app called Moodle Mobile. Students log in to Moodle; from there they have access to all course content.

Students may access the Adobe Connect room via a link within their Moodle course that the instructor has set up for them. The University uses Adobe Connect for class meetings. It is a way to enable students to participate in class discussion with fellow classmates as well as the instructor. Students may chat with other course members, share documents among other files, and present to the class via visual and audio. Online courses have a once a week mandatory "live" chat time meeting. These meetings are all listed in Central Standard Time; it is the student's responsibility to plan in accordance to that. If a student misses one of the live chats, they are to contact their instructor immediately. The school does offer a participant's guide for students needing assistance in navigating through Adobe Connect, located at <http://content.learninghouse.com/training/student-tutorials/adobeconnect/AdobeConnect-Student.pdf>.

Students who are having difficulty accessing their online courses are encouraged to contact the Learning House 24/7 Help Center by dialing 1-800-985-9781, or through live chat and email support, more information can be accessed at <http://bu.learninghouse.com>. There are a number of tutorials accessible to the student in regards to course content and site navigation.

*Student Learning Resources:* The University offers library resources and support through the Fr. Leonard Alvey Library <http://libguides.brescia.edu/home>. Distance education students have access to a number of online resources via the library webpage. Those resources include books, e-books, articles, course reserves, databases, journals, libguides, newspapers, reference sources, and a number of streaming videos.

Students may choose to take advantage of the Ask a Librarian option. They are able to chat with a librarian through LibChat located at <http://libanswers.brescia.edu/>. Listed on the site are a number of other forms of contact for librarians such as email, text, and phone. The Library

home page also includes links to Interlibrary Loan, Library Tutorials, guides on citing sources and plagiarism.

Tutoring assistance is available to students through the Tutoring Learning Center (TLC). The TLC site also includes a wide variety of online mathematics and language arts tutoring tools.

*Curriculum Evaluation and Development:* The University has a course review process in place in which reviews are staggered across a five year period. Under special circumstances a review of a particular program may be requested sooner by the President, Academic Dean, or School Chairperson sooner. The University has a committee in place, the Academic Program Review Committee (APRC) to function as an advisory committee to the Academic Dean in the review of academic programs. When commissioned by the President, the APRC will serve as a presidential advisory committee for questions related to global program assessment and evaluation, as well as in the event that programs must be discontinued because of declared financial exigency or for educational reasons. The committee documents strengths and weaknesses of a program, and if a serious weakness is found, the committee will recommend necessary steps of action to correct it. The findings by the Committee get submitted in writing to the Academic Dean, the appropriate school chairperson, and the area coordinator.

New programs are developed by faculty with approval of the school chairperson and Academic Dean, and presented to the Curriculum Committee on a form obtained in the Academic Dean's office. The Curriculum Committee has certain guidelines they must follow in consideration of a program. If a program approved by the committee has serious budgetary implications or if it represents a significantly new direction for the University, it must be taken by the Academic Dean to the Cabinet and Academic Affairs Committee of the Board of Trustees for final approval. New programs are approved for a period of three years after which they are subject to review by the APRC to ensure continuance.

*Student Complaints Process:* The University maintains a student grievance reporting procedure located at <https://www.brescia.edu/reporting-procedures-and-options>. Students may file grievances for numerous reasons, including: academic issues, administrative issues, discrimination issues, and academic dishonesty. The student can take the complaint to their instructor, if the issue remains unresolved, the student may then take their concern to the chair of the school, and furthermore to the Academic Dean. If the issue still remains unresolved, the Dean will appoint a review board, consisting of three faculty members and two students chosen specifically. If the University is unable to resolve the issue internally, Iowa students may contact the Commission for further assistance. The student may find the Commission's contact information at <https://www.brescia.edu/consumer-information>.

### **Distance Education Programs Offered In Iowa**

The total, estimated cost of civilian tuition, fees, books and supplies for each program is listed below for Brescia University Online. Note: estimated costs for the undergraduate programs were derived from Brescia University's most recent annual tuition, fee, book and supply costs posted on the College Navigator website.

#### *Certificate Programs:*

- Certificate in Accounting: \$23,600

#### *Associate Degree Programs:*

- Associate Degree in Liberal Arts: \$33,575
- Associate of Arts in Human Services: \$33,575
- Associate of Science in Business: \$33,575
- Associate of Arts in Graphic Design: \$33,575
- Associate of Arts/ Science in Integrated Studies: \$33,575

*Baccalaureate Degree Programs:*

- Bachelor of Science in Business: \$67,680
- Bachelor of Science in Accounting: \$67,680
- Bachelor of Arts in Psychology: \$67,680
- Bachelor of Integrated Studies of Art of Science: \$67,680
- Bachelor of Arts in Political Science: \$67,680
- Bachelor of Arts in Theology: \$67,680
- Bachelor of Social Work: \$67,680

*Master Degree Programs:*

- Master of Science in Management: \$21,930
- Master of Science in Teacher Leadership: \$24,465

*Field Experience:* The University has integrated a form of field experience into a number of programs available through distance education, which is to be completed on site in the state of Iowa. The following is a list of programs which contain field experience and the description of the field experience required through the program:

- Bachelor of Arts in Theology: this program contains a course which requires a field experience to be completed. It is the student's responsibility to secure a position from an institutionally-approved list, the program faculty and the placement director may provide assistance in doing so if necessary. The student sets goals and objectives for the experience, which they must attain. In order for a student to be placed within the internship, they must be a senior and have permission of their instructor. This internship requires a minimum of 120 contact hours on site for completion.
- Bachelor of Social Work: this program contains two field practicum courses; both of these courses involve on-site field activity and a weekly seminar that the student must attend. Student has primary responsibility in securing a position with an institutionally approved organization, but can request assistance from the program faculty and placement director.

**Registration Compliance**

As required by Iowa Code Section 261B.4, the University disclosed its institutional policy for refunding tuition charges to students who withdraw from its programs. The University discloses its policy to students on its website at <https://www.brescia.edu/uploads/Refund-Policy-Withdrawals-effective-2016-Aug01.pdf>. Iowa registration law and rule do not govern the University's tuition refund policy because it is not a for-profit institution.

Administrative rules specifically require the school to comply with the requirements of Chapter 261.9(1) "e" through "h".

- Iowa Code Section 261.9(1)(e) requires a school to maintain and disseminate a drug and alcohol abuse policy that includes sanctions for violation of the school's policy and

information about the availability of drug or alcohol counseling or rehabilitation. Iowa Code Section 261.9(1)(f) requires a school to maintain and disseminate a sexual abuse policy that includes information about counseling opportunities and reporting instances of sexual abuse to school officials and law enforcement. These requirements duplicate policies and disclosures required by the federal Department of Education for a school that participates in the federal student aid programs. The University complies with the requirements of Iowa Code Section 261.9(1)(e) and (f), and discloses these policies to students in various locations and documents posted on its website, those locations are:

- ✓ <https://www.brescia.edu/sexual-misconduct-policies-and-definitions>
- ✓ <https://www.brescia.edu/resources-for-medical-counseling-or-pastoral-care>
- ✓ <https://www.brescia.edu/harassment>
- ✓ <https://www.brescia.edu/reporting-procedures-and-options>
- ✓ <https://www.brescia.edu/accommodations-safety-measures-and-interim-measures>
- ✓ <https://www.brescia.edu/uploads/BU-Student-Handbook-and-Planner-2015-16.pdf>
- ✓ <https://www.brescia.edu/counseling-resources>
- ✓ <https://www.brescia.edu/uploads/Brescia-Campus-Crime-Report-Brochure-October-2015.pdf>

Eva Atkinson, M.A., LMFT, CADC, is the University's on call counselor. She can help any online student to locate drug and alcohol abuse resources in the student's specific area. In the case of an online student who has suffered sexual assault, Ms. Atkinson can help a student find counseling and other resources in the student's local area.

- Iowa Code Section 261.9(1)(g) requires a school to maintain a special policy for refunding tuition and mandatory fees to members of the Iowa National Guard or reserve members of the U.S. Armed Forces, or the spouse of such a member if the member has a dependent child, when the service member or spouse must withdraw from the school because the service member has been called to active (Iowa) state or federal military duty or service. The University adopted the Iowa tuition refund policy institution-wide and discloses the policy on its website at <https://www.brescia.edu/uploads/Refund-Policy-Withdrawals-effective-2016-Aug01.pdf>.
- Iowa Code Section 261.9(1)(h) requires a school to develop and implement a policy requiring employees, who in the course of their employment, attend, examine, counsel, or treat a child to immediately report suspected incidents of child physical and sexual abuse to law enforcement and to the school. By cross-reference to existing administrative rules for registration [283-21.2(261B), subsection 7], this policy applies to schools that offer distance education programs and that have Iowa-resident employees or contractors (including online program faculty). The University does not employ or contract with Iowa-based faculty or staff. Therefore, this policy is not required of the school.

*Student Consumer Information:* In its registration application, the University affirms its willingness to comply with the requirements of Iowa Code Chapter 261.9, as stipulated by Iowa Code Section 261B.4(8). Chapter 261.9 requires a school to disclose to students information about the school's programs, charges, tuition refund policies, whether a certificate or diploma awarded by the school is applicable toward a degree program the school offers, and the identity of the school's accrediting agency. These disclosures are duplicative of the federal Department of Education's student consumer information disclosure requirements for a school

that participates in the federal student aid programs and the University discloses them in its Catalog <https://www.brescia.edu/uploads/2014-2016-Catalog1.pdf>.

Brescia University affirms on the application that it will comply with the provisions of Iowa Code Section 261B.7. These provisions of Iowa Code state that, provided the school does not claim "approval" or "accreditation," the school must disclose to students that it is registered by the Commission and provide Commission contact information for students who have questions or complaints about the school. The University will provide this information to Iowa-resident students on its consumer information page at <https://www.brescia.edu/consumer-information>.

*Financial Responsibility:* the University submitted a copy of an independent audit conducted by Ebelhar Whitehead, PLLC, as of May 31, 2012 and 2013. The auditing firm expressed its opinion that the financial statements of the University present fairly, in all material respects, the financial position of the University.

- A private non-profit institution that participates in the federal student aid programs must maintain a composite score, based on a three factor financial responsibility ratio, of at least 1.5 in order to be determined "financially responsible" without additional oversight. The most recent composite score for Brescia University reported by the federal Department of Education is for the institutional fiscal year ending June 30, 2013: 2.1 (out of a possible 3.0).
- The institution is not required to calculate the percentage of its revenue derived from federal student aid funds since it is not a for-profit institution.

*Full-Time Iowa Resident Faculty Member or Program Coordinator:* Brescia University has no Iowa resident faculty or staff. Iowa registration law and rule do not require a school to employ a full-time, Iowa-based faculty member or program coordinator if it applies for authorization to offer only distance education programs.

*Instructional/Supervisory Staff Qualifications:* The University provided staff with the resumes of 18 full-time faculty members and 48 part-time faculty members.

Seven of the 18 full-time faculty members hold masters degrees in various fields that include business administration, education, experimental psychology and social work. One of these instructors holds three masters degrees, including gerontology, social work, and sociology. Another of these instructors is pursuing a doctoral degree. Eleven of the 18 instructors hold doctoral degrees in fields such as education, theology, social work, psychology, and zoology.

Out of the 48 part-time faculty members reviewed, 29 hold masters degrees in fields such as communication, education, English, history, library science, philosophy and social work. Two of the instructors holds a dual masters degree in philosophy and criminology. Another instructor holds a dual degree in curriculum and instruction, and English literature. One of the instructors with a master's degree is also a doctoral candidate. Nineteen of the 48 faculty members hold doctoral degrees in fields such as biblical studies, biochemistry and molecular biology, clinical psychology, education, ministry, political science, social work, and theology.

*Commitment to Iowa Students and Teach-Out:* by executing an electronic signature on the registration application, Brescia University President, Larry Hostetter, S.T.D, committed to the

delivery of programs the University offers and agreed to provide alternatives for students to complete programs at the University or another school if the University closes a program, or if the University closes before students have completed their courses of study.

*Student Complaints:* None.

### **Compliance with Iowa Code Chapter 714**

#### *Section 714.18 – Evidence of Financial Responsibility*

Brescia University has filed satisfactory evidence of financial responsibility under Iowa Code Section 714.18, including a current, continuous corporate surety bond in the amount of \$50,000 issued by Liberty Mutual Surety.

#### *Section 714.23 – State Tuition Refund Policy*

The Iowa tuition refund policy does not apply to Brescia University because it is not a for-profit institution.